

EXHIBIT 6

7 election. I don't know.

8 Q. But if there were elections for JP and
9 constable, they would have used the historic VTDs?

10 A. Correct.

11 Q. Is that what that's trying to say. I
12 think that's it. Just one more thing. Did you
13 confer with your attorney on the breaks during this
14 deposition?

15 A. I'm sorry. Can you repeat that?

16 Q. Did you confer with your attorney during
17 the breaks on this deposition?

18 A. I don't know what that means.

19 Q. Did you discuss the deposition with your
20 attorney at all during the breaks?

21 A. No.

22 Q. Okay. And I will, I guess, pass to
23 Ms. Reyes.

24 MS. REYES: Thank you, Mr. Gonzalez.

25 Bernadette Reyes on behalf of the Petteway
UNEDITED, UNPROOFREAD, UNCORRECTED, UNCERTIFIED
ROUGH DRAFT

230

1 plaintiffs. We don't have any further questions for
2 Mr. Sigler at this time, but I do want to clarify
3 that we are not agreeing that the deposition is
4 concluded, specifically we are reserving the right
5 to reconvene the deposition of Mr. Sigler once the

6 court has ruled on the issue of the attorney-client
7 privilege raised at this deposition, specifically
8 regarding Dale Oldham.

9 MR. GONZALEZ: And the NAACP plaintiffs
10 will make the same reserves.

11 MS. JAYARAMAN: And the United States
12 makes the same reservation.

13 MR. RUSSO: I think most of your arguments
14 are captured so we'll take it up with the court when
15 necessary.

16 THE REPORTER: Is there anything else for
17 the record?

18 MR. RUSSO: Yeah, let's go off the record
19 for two minutes.

20 (Off record from 6:27 to 6:30)

21 BY MR. RUSSO:

22 Q. So defense are going to reserve questions
23 for trial. I think that ends the deposition.

24

25

